

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION

C.J., a minor, by and through her)
next friend and guardian, BETTY)
JEAN MURPHY JAMES,)
)
and)
)
BETTY JEAN MURPHY JAMES,)
as Administrator of the Estate of)
Latoya James)
)
Plaintiffs,) CIVIL ACTION
) FILE NO.: 2:22-CV-00078-LGW-BWC
v.)
)
MICHAEL BLAQUIERE, in his)
individual capacity, as Camden County)
Deputy Sheriff)
)
and)
)
DOWNY CASEY, in his individual)
capacity, as a Camden County Deputy)
Sheriff)
)
and)
)
JOHN/JANE DOES, in their individual)
capacities, as Camden County Deputies)
)
Defendants.)

**CONSENT MOTION FOR LEAVE TO DEPOSE
CONFINED PERSON AND BRIEF IN SUPPORT**

COME NOW plaintiffs and defendants, and pursuant to FED. R. CIV. P. 30(a)(2), request the Court for leave to depose Varshan Lamont Brown, an incarcerated person, showing the Court as follows:

Plaintiffs have filed this action alleging decedent Latoya James' constitutional rights were violated during the execution of a search warrant on May 4, 2021, at a residence located in Woodbine, Camden County, Georgia. Varshan Lamont Brown was present at the residence at the time the search warrant was executed. Upon information and belief, Varshan Lamont Brown is currently incarcerated at the Brantley County Jail located in Nahunta, Georgia. The parties agree that Mr. Brown's deposition is necessary to the prosecution and defense of this case.

Under FED. R. CIV. P. 30(a)(2), leave of Court is required to depose a person incarcerated in a prison. The parties seek to depose Mr. Brown at a time that is mutually convenient to the Brantley County Jail and counsel of record.

Consented to this 23rd day of June, 2023.

FREEMAN MATHIS & GARY, LLP

/s/ Steven L. Grunberg

Sun S. Choy

Georgia Bar No. 025148

schoy@fmglaw.com

Wesley C. Jackson

Georgia Bar No. 336891

wjackson@fmglaw.com

Steven L. Grunberg

Georgia Bar No. 146397

sgrunberg@fmglaw.com

Attorneys for defendants

100 Galleria Parkway
Suite 1600
Atlanta, GA 30339-5948
(770) 818-0000 (Telephone)
(770) 937-9960 (Facsimile)

[Signatures continued on next page.]

STROM LAW FIRM, LLC

/s/ *Mario A. Pacella**

Mario A. Pacella
Georgia Bar No. 558519
mpacella@stromlaw.com

Attorney for plaintiffs

**signed with express permission by*
Steven L. Grunberg

6923 N. Trenholm Road
Suite 200
Columbia, SC 29206
(803) 252-4800 (Telephone)
(803) 252-4801 (Facsimile)

CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically submitted the foregoing **CONSENT MOTION FOR LEAVE TO DEPOSE CONFINED PERSON AND BRIEF IN SUPPORT** to the Clerk of Court using the CM/ECF system which will automatically send electronic mail notification of such filing to counsel of record who are CM/ECF participants.

Counsel of record are:

Reginald A. Greene
Georgia Bar No. 308674
Greene Legal Group, LLC
One Georgia Center, Suite 605
600 West Peachtree Street, N.W.
Atlanta, GA 30308
(404) 574-4308
Fax: (912) 574-4312
regreene@greenegalgroup.com

Mario A. Pacella
Georgia Bar No. 558519
Bakari T. Sellers
(Pro hac vice to be filed)
Strom Law Firm, LLC
P.O. Box 1635
Brunswick, Georgia 31521
(912) 264-6465
Fax: (912) 264-6470
6923 N. Trenholm Road, Suite 200
Columbia, SC 29206
(803) 252-4800
Fax: (803) 242-4801
mpacella@stromlaw.com
bsellers@stromlaw.com

Harry M. Daniels
(Pro hac vice to be filed)
4751 Best Road Suite 490
Atlanta, GA 30337
Tel. 678.664.8529
Fax. 800.867.5248
daniels@harrymdaniels.com

This 23rd day of June, 2023.

/s/ Steven L. Grunberg
Steven L. Grunberg
Georgia Bar No. 146397
sgrunberg@fmglaw.com

FREEMAN MATHIS & GARY, LLP
100 Galleria Parkway
Suite 1600
Atlanta, Georgia 30339-5948
T: (770) 818-0000
F: (770) 937-9960